

EXHIBIT 18

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

COMMUNITIES FOR A BETTER) CASE NO.
ENVIRONMENT, A CALIFORNIA) 997013
NON-PROFIT CORPORATION, ON)
BEHALF OF THE GENERAL PUBLIC,)
)
PLAINTIFF,)
)
VS.)
)
UNOCAL CORPORATION, ET AL.,)
)
DEFENDANTS.)-----)

DEPOSITION OF MEENA NAINAN

FRIDAY, AUGUST 11, 2000

FILE NO. 000811TRB
REPORTED BY TERRY R. BANKEY, C.S.R. NO. 7442



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09:21 AM I'll go back and ask some questions about it.

2 A I've worked for a little over ten years for
3 Mobil Oil.

4 Q You began just after graduation?

09:21 AM A In April of '90.

6 Q What was your position when you first
7 started working for Mobil?

8 A I was a resale construction engineer in New
9 Jersey.

09:21 AM Q Was that the construction of service
11 stations as you discussed earlier?

12 A Yes.

13 Q For how long were you a resale construction
14 engineer?

09:22 AM A For approximately two, two and a half years.

16 Q Until approximately 1992 or three?

17 A Yes.

18 Q And then how did your position change?

19 A I was then put into the environmental

09:22 AM remediation department.

21 Q Were you still located in New Jersey?

22 A Yes.

23 Q What was your position in the environmental
24 remediation department?

09:22 AM A I was a field remediation engineer.

09:22 AM Q For how long were you a field remediation
2 engineer for Mobil?

3 A For approximately two and a half years in
4 New Jersey.

09:22 AM Q So in approximately 1995 you moved from
6 New Jersey to another division?

7 A Yeah. I was then transferred to Fairfax,
8 Virginia, which is Mobil's headquarters, and I was a
9 remediation specialist.

09:23 AM Q I assume that your switch from field
11 remediation engineer to a specialist was some sort of
12 promotion?

13 A Yes.

14 Q Did your work as a remediation specialist
09:23 AM focus on remediation of contamination at service
16 station sites?

17 A Service station sites as well as our larger
18 bulk plants and terminals.

19 Q And for how long were you a remediation
09:23 AM specialist in Fairfax, Virginia?

21 A For a little over one year.

22 Q In 1996, approximately, you switched and
23 went where?

24 A From -- for part of 1996 I was a field
09:23 AM remediation engineer stationed in Virginia for

09:23 AM Pennsylvania.

2 Q And what about -- is that the first part of
3 1996?

4 A Yeah, and then the latter half of 1996 I was
09:24 AM transferred to Los Angeles. I was a field engineer
6 on the West Coast.

7 Q What caused your switch from a remediation
8 specialist in Virginia back to a field remediation
9 engineer?

09:24 AM A We went -- our company went through a
11 reorganization and as a result I was placed in the
12 field.

13 Q What type of reorganization are we talking
14 about?

09:24 AM A A complete company reorganization.

16 Q Is that the Exxon, where it became --

17 A No. This is what we called the SRP, or the
18 Staff Redesign Project, and it was internal to Mobil.

19 Q Are you still a field engineer in L.A.?

09:25 AM A No, I'm not.

21 Q Okay. What did you -- well, for how long
22 were you a field engineer in L.A.?

23 A Until approximately April of this year.

24 Q Where have you been working since April of
09:25 AM this year?

09:25 AM A I am in San Juan, Puerto Rico. I am the
2 environmental remediation Caribbean area manager.

3 Q You did that for Exxon Mobil?

4 A Yes.

09:25 AM Q I don't know how to describe it because I
6 don't know about it yet, but when did Mobil switch to
7 Exxon Mobil or whatever it was that -- that switched
8 the name? When did that occur?

9 A In approximately December of 1999.

09:26 AM Q And what happened?

11 A It was a merger between Exxon Corporation
12 and Mobil.

13 Q For those sites that were owned by Exxon in
14 California -- and when I say sites, I mean service
09:26 AM stations.

16 A Uh-huh.

17 Q Who owns those today?

18 MS. WEAVER: Objection. The questions that
19 you've been asking for the last couple are beyond the
09:26 AM scope of the issues set forth in the notice.

21 To the extent that you need to understand
22 her employment, you know, we can go into that. To
23 the extent you're asking this witness for as a
24 representative of the corporation to explain
09:26 AM ownership of assets and how things may have been